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OORAH, INC.,
OORAH CATSKILL RETREAT LLC
a/k/a "THE ZONE"

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

DORINA SOKOLOVSKY,

Plaintiff,

-against-

OORAH, INC., OORAH CATSKILL RETREAT LLC
a/k/a "THE ZONE," and GITTIE SHEINKOPF,

Defendants.

Docket No: 1:20-cv-04116

ANSWER

Defendants OORAH, INC. and OORAH CATSKILL RETREAT LLC a/k/a "THE ZONE" ("Defendants"), by their attorneys Segal McCambridge Singer & Mahoney, Ltd., answering the Verified Complaint, upon information and belief allege as follows:

PARTIES, JURISDICTION, AND VENUE

1. Defendants deny the truth of the allegations contained in paragraph "1" of the Verified Complaint.
2. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph "2" of the Verified Complaint.
3. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph "3" of the Verified Complaint and admit that Oorah, Inc. is a not-for-profit 501(c)(3)

organization incorporated in the State of New Jersey with its principal place of business located at 1805 Swarthmore Avenue, Lakewood, New Jersey 08701.

4. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph “4” of the Verified Complaint except Oorah Catskill Retreat LLC a/k/a “The Zone” is a limited liability company formed in the State of New York with the sole member of the limited liability company being Oorah, Inc. Oorah Catskill Retreat LLC has a place of business at County Rte. 14, South Road, Gilboa, New York 12076.

5. Defendants deny the truth of the allegations contained in paragraph “5” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

6. Defendants deny each and every allegation contained in paragraph “6” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

7. Defendants deny each and every allegation contained in paragraph “7” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

8. Defendants deny each and every allegation contained in paragraph “8” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

9. Defendants deny each and every allegation contained in paragraph “9” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

10. Defendants deny each and every allegation contained in paragraph “10” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

**FACTS COMMON TO ALL CLAIMS AND FIRST CAUSE OF ACTION; NEGLIGENCE OF
OORAH, INC.; OORAH CATSKILL RETREAT LLC A/K/A “THE ZONE”;
AND GITTE SHEINKOPF**

11. Defendants deny, in the form alleged, any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “11” of the Verified Complaint, except admit that Defendants owned “The Zone.”

12. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph “12” of the Verified Complaint, except admit that in the summer of 2010, Plaintiff attended The Zone summer camp for girls, respectfully leaving legal conclusions to the Court.

13. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “13” of the Verified Complaint.

14. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “14” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

15. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “15” of the Verified Complaint.

16. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “16” of the Verified Complaint.

17. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations regarding Co-Defendant contained in paragraph “17” of the Verified Complaint, and deny the truth of the allegations that pertain to Defendants, respectfully leaving legal conclusions to the Court.

18. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations regarding Co-Defendant contained in paragraph “18” of the Verified Complaint, and deny the truth of the allegations that pertain to Defendants.

19. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “19” of the Verified Complaint.

20. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “20” of the Verified Complaint.

21. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “21” of the Verified Complaint.

22. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations regarding Co-Defendant contained in paragraph “22” of the Verified Complaint, and deny the truth of the allegations that pertain to Defendants.

23. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “23” of the Verified Complaint.

24. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “24” of the Verified Complaint.

25. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “25” of the Verified Complaint.

26. Defendants admit the truth of the allegations contained in paragraph “26” of the Verified Complaint to the extent that Defendants owned the Zone summer camp located at 964 South Gilboa Road, Gilboa, New York 12076.

27. Defendants deny the truth of the allegations contained in paragraph “27” of the Verified Complaint.

28. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph “28” of the Verified Complaint, except admit that Rabbi Binyomin Gissinger was the Camp Director at the “The Zone” in approximately 2010.

29. Defendants deny the truth of the allegations contained in paragraph “29” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

30. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph “30” of the Verified Complaint that pertain to Defendants and deny knowledge or information sufficient to form a belief as to the truth of the allegations that pertain to Co-Defendant.

31. Defendants deny the truth of the allegations contained in paragraph “31” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

32. Defendants deny the truth of the allegations contained in paragraph “32” of the Verified Complaint that pertain to Defendants and deny any knowledge or information sufficient to form a belief as to the truth of the allegations that pertain to Co-Defendant.

33. Defendants deny the truth of the allegations contained in paragraph “33” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

34. Defendants deny the truth of the allegations contained in paragraph “34” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

35. Defendants deny the truth of the allegations contained in paragraph “35” of the Verified Complaint.

36. Defendants deny the truth of the allegations contained in paragraph “36” of the Verified Complaint.

37. Defendants deny the truth of the allegations contained in paragraph “37” of the Verified Complaint.

38. Defendants deny the truth of the allegations contained in paragraph “38” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

39. Defendants deny the truth of the allegations contained in paragraph “39” of the Verified Complaint.

40. Defendants deny the truth of the allegations contained in paragraph “40” of the Verified Complaint.

41. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “41” of the Verified Complaint.

42. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph “42” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

43. Defendants deny the truth of the allegations contained in paragraph “43” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

44. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph “44” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

45. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph “45” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

46. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph “46” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

47. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “47” of the Verified Complaint.

48. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph “48” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

49. Defendants deny the truth of the allegations contained in paragraph “49” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

50. Defendants deny the truth of the allegations contained in paragraph “50” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

51. Defendants deny the truth of the allegations contained in paragraph “51” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

52. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “52” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

53. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “53” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

54. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “54” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

55. Defendants deny the truth of the allegations contained in paragraph “55” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

56. Defendants deny the truth of the allegations contained in paragraph “56” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

57. Defendants deny the truth of the allegations contained in paragraph “57” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

58. Defendants deny the truth of the allegations contained in paragraph “58” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

59. Defendants deny the truth of the allegations contained in paragraph “59” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

60. Defendants deny the truth of the allegations contained in paragraph “60” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

61. Defendants deny the truth of the allegations contained in paragraph “61” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

62. Defendants deny the truth of the allegations contained in paragraph “62” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

63. Defendants deny the truth of the allegations contained in paragraph “63” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

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65. Defendants deny the truth of the allegations contained in paragraph “65” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

66. Defendants deny the truth of the allegations contained in paragraph “66” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

67. Defendants deny the truth of the allegations contained in paragraph “67” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

68. Defendants deny the truth of the allegations contained in paragraph “68” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

69. Defendants deny the truth of the allegations contained in paragraph “69” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

70. Defendants deny the truth of the allegations contained in paragraph “70” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

71. Defendants deny the truth of the allegations contained in paragraph “71” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

72. Defendants deny the truth of the allegations contained in paragraph “72” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

73. Defendants deny the truth of the allegations contained in paragraph “73” of the Verified Complaint.

74. Defendants deny the truth of the allegations contained in paragraph “74” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

75. Defendants deny the truth of the allegations contained in paragraph “75” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

76. Defendants deny the truth of the allegations contained in paragraph “76” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

77. Defendants deny the truth of the allegations contained in paragraph “77” of the Verified Complaint.

78. Defendants deny the truth of the allegations contained in paragraph “78” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

79. Defendants deny the truth of the allegations contained in paragraph “79” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

80. Defendants deny the truth of the allegations contained in paragraph “80” of the Verified Complaint.

81. Defendants deny the truth of the allegations contained in paragraph “81” of the Verified Complaint.

82. Defendants deny the truth of the allegations contained in paragraph “82” of the Verified Complaint.

83. Defendants deny the truth of the allegations contained in paragraph “83” of the Verified Complaint.

84. Defendants deny the truth of the allegations contained in paragraph “84” of the Verified Complaint.

85. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph “85” of the Verified Complaint.

86. Defendants deny the truth of the allegations contained in paragraph “86” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

87. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “87” of the Verified Complaint.

88. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph “88” of the Verified Complaint.

89. Defendants deny the truth of the allegations contained in paragraph “89” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

90. Defendants deny the truth of the allegations contained in paragraph “90” of the Verified Complaint.

91. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph “91” of the Verified Complaint.

92. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph “92” of the Verified Complaint.

93. Defendants deny the truth of the allegations contained in paragraph “93” of the Verified Complaint.

94. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph “94” of the Verified Complaint.

95. Defendants deny the truth of the allegations contained in paragraph “95” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

96. Defendants deny the truth of the allegations contained in paragraph “96” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

97. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph “97” of the Verified Complaint.

98. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “98” of the Verified Complaint that pertain to Co-Defendant and deny the truth of the allegations that pertain to Defendants.

99. Defendants deny the truth of the allegations contained in paragraph “99” of the Verified Complaint.

100. Defendants deny the truth of the allegations contained in paragraph “100” of the Verified Complaint regarding Defendants.

101. Defendants deny the truth of the allegations contained in paragraph “101” of the Verified Complaint regarding Defendants.

102. Defendants deny the truth of the allegations contained in paragraph “102” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

**AS AND FOR A SECOND CAUSE OF ACTION FOR RESPONDEAT SUPERIOR/
VICARIOUS LIABILITY AGAINST OORAH DEFENDANTS**

103. Defendants repeat and reallege the allegations contained in paragraph “103” of the Verified Complaint.

104. Defendants deny the truth of the allegations contained in paragraph “104” of the Verified Complaint.

105. Defendants deny the truth of the allegations contained in paragraph “105” of the Verified Complaint except admit that Rabbi Binyomin Gissinger was the Director of the “The Zone” for a period of time in approximately 2010.

106. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph “106” of the Verified Complaint.

107. Defendants deny the truth of the allegations contained in paragraph “107” of the Verified Complaint.

108. Defendants deny the truth of the allegations contained in paragraph “108” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

109. Defendants deny the truth of the allegations contained in paragraph “109” of the Verified Complaint.

110. Defendants deny the truth of the allegations contained in paragraph “110” of the Verified Complaint.

111. Defendants deny the truth of the allegations contained in paragraph “111” of the Verified Complaint.

112. Defendants deny the truth of the allegations contained in paragraph “112” of the Verified Complaint.

113. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph “113” of the Verified Complaint.

114. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “114” of the Verified Complaint.

115. Defendants deny the truth of the allegations contained in paragraph “115” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

**AS AND FOR A THIRD CAUSE OF ACTION FOR NEGLIGENT HIRING, RETENTION
AND SUPERVISION AGAINST OORAH DEFENDANTS**

116. Defendants repeat and reallege the allegations contained in paragraph “116” of the Verified Complaint.

117. Defendants deny the truth of the allegations contained in paragraph “117” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

118. Defendants deny, in the form alleged, the truth of the allegations contained in paragraph “118” of the Verified Complaint.

119. Defendants deny the truth of the allegations contained in paragraph “119” of the Verified Complaint.

120. Defendants deny the truth of the allegations contained in paragraph “120” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

121. Defendants deny the truth of the allegations contained in paragraph “121” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

122. Defendants deny the truth of the allegations contained in paragraph “122” of the Verified Complaint.

123. Defendants deny the truth of the allegations contained in paragraph “123” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

124. Defendants deny the truth of the allegations contained in paragraph “124” of the Verified Complaint.

125. Defendants deny the truth of the allegations contained in paragraph “125” of the Verified Complaint.

126. Defendants deny the truth of the allegations contained in paragraph “126” of the Verified Complaint.

AS AND FOR A FOURTH CAUSE OF ACTION FOR NEGLIGENCE/
PREMISES LIABILITY AGAINST OORAH DEFENDANTS

127. Defendants repeat and reallege the allegations contained in paragraph “127” of the Verified Complaint.

128. Defendants deny the truth of the allegations contained in paragraph “128” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

129. Defendants deny the truth of the allegations contained in paragraph “129” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

130. Defendants deny the truth of the allegations contained in paragraph “130” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

131. Defendants deny the truth of the allegations contained in paragraph “131” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

132. Defendants deny the truth of the allegations contained in paragraph “132” of the Verified Complaint.

133. Defendants deny the truth of the allegations contained in paragraph “133” of the Verified Complaint.

134. Defendants deny the truth of the allegations contained in paragraph “134” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

135. Defendants deny the truth of the allegations contained in paragraph “135” of the Verified Complaint, respectfully leaving legal conclusions to the Court.

136. Defendants deny the truth of the allegations contained in paragraph “136” of the Verified Complaint.

137. Defendants deny the truth of the allegations contained in paragraph “137” of the Verified Complaint.

AS AND FOR A FIFTH CAUSE OF ACTION AGAINST DEFENDANT GITTIE SHEINKOPF

138. Defendants repeat and reallege the allegations contained in paragraph “138” of the Verified Complaint.

139. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “139” of the Verified Complaint.

140. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “140” of the Verified Complaint.

141. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “141” of the Verified Complaint.

142. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “142” of the Verified Complaint.

143. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “143” of the Verified Complaint.

144. Defendants deny any knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph “144” of the Verified Complaint.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

145. At all times relevant to the Plaintiff's Verified Complaint, Co-Defendant was not employed by or in *a respondeat superior* or agency relationship with Defendants, so the alleged conduct complained of was not committed in the scope of her employment at "The Zone" but for her own interests.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

146. Defendants lacked notice of the alleged conduct complained of, an opportunity to remedy the conduct complained of, or Co-Defendant's alleged propensity for the same.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

147. The culpable conduct of third parties responsible for the incident complained of as alleged in the Verified Complaint constituted an unforeseeable separate, independent, superseding, intervening culpable acts or acts which constitute the sole proximate cause of the occurrence alleged.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

148. The cause(s) of action alleged in the Verified Complaint are barred by the applicable statute(s) of limitations.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

149. Defendants reserve the right to amend their Answer and adopt additional defenses and affirmative defenses, and to rely upon further defenses and affirmative defenses which become available or appear during discovery proceedings in this action. Defendants also hereby specifically reserve the right to amend their Answer for the purposes of asserting any such additional defenses and affirmative defenses.

AS AND FOR A SIXTH AFFIRMATIVE DEFENSE

150. Defendants invoke the protection of CPLR Article 1601, et seq. so that the liability of Defendants is limited to their equitable share, determined in accordance with the relative culpability of all persons or entities contributing to the total liability for non-economic loss, including named parties and others over whom Plaintiff could have obtained jurisdiction with due diligence.

AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE

151. Plaintiff has failed to name necessary parties.

AS AND FOR AN EIGHTH AFFIRMATIVE DEFENSE

152. Defendants are not authorized to accept service of process on behalf of, and are not agents for, Co-Defendant.

AS AND FOR A NINTH AFFIRMATIVE DEFENSE

153. The amount, verdict, judgment or award rendered must be reduced the amount assessed for a lack of due care or culpable conduct attributable to Plaintiff (Article 14).

AS AND FOR A TENTH AFFIRMATIVE DEFENSE

154. The conduct complained of, in part, occurred at the premises owned, managed, controlled and supervised by third-parties known to Plaintiff but not named or sued by Plaintiff.

AS AND FOR AN ELEVENTH AFFIRMATIVE DEFENSE

155. Any verdict, judgment or decision that might be obtained by plaintiff against the answering defendants shall be reduced by the amount of any collateral source payments received by plaintiff pursuant to CPLR § 4545(c) as determined by the Court.

JURY DEMAND

156. Defendants request a trial by jury.

AS AND FOR A FIRST CROSS-CLAIM AGAINST DEFENDANT, GITTIE SHEINKOPF

157. Upon information and belief, that if and in the event the Plaintiff sustained damages as alleged in the Verified Complaint, all of which is denied by the answering Defendants, said damages were caused by the negligence, culpable conduct, intentional and/or wrongful acts of Co-Defendant, GITTIE SHEINKOPF, and not through any acts of negligence, culpable or wrongful conduct on the part of Defendants.

158. By reason of the foregoing, OORAH, INC. and OORAH CATSKILL RETREAT, LLC, a/k/a “THE ZONE” are entitled to common-law indemnification from, and to have judgement over and against, Co-Defendant GITTIE SHEINKOPF, for all or part of any verdict or judgment that Plaintiff may recover against OORAH, INC. and OORAH CATSKILL RETREAT, LLC, a/k/a “THE ZONE.”

AS AND FOR A SECOND CROSS-CLAIM AGAINST DEFENDANT, GITTIE SHEINKOPF

159. Upon information and belief, that if and in the event the Plaintiff sustained any damages as alleged in the Verified Complaint, all of which are denied by OORAH, INC. and OORAH CATSKILL RETREAT, LLC, a/k/a “THE ZONE,” said damages were caused by the negligence, culpable conduct, intentional and/or wrongful acts of Co-Defendant, GITTIE

SHEINKOPF, not through any acts of negligence, culpable or wrongful conduct on the part of OORAH, INC. and OORAH CATSKILL RETREAT, LLC, a/k/a “THE ZONE.”

160. By reason of the foregoing, OORAH, INC. and OORAH CATSKILL RETREAT, LLC, a/k/a “THE ZONE” are entitled to contribution from, and to have judgment over and against, Co-Defendant, GITTIE SHEINKOPF, or all or part of any verdict or judgment that Plaintiff may recover against OORAH, INC. and OORAH CATSKILL RETREAT, LLC, a/k/a “THE ZONE.”

WHEREFORE, Defendants, OORAH, INC. and OORAH CATSKILL RETREAT, LLC, a/k/a “THE ZONE,” demand judgment dismissing the Verified Complaint in its entirety, and judgment on the cross-claims asserted against Co-Defendant, together with attorney’s fees, costs and disbursements incurred in the defense of this action or, in the alternative, demands that any judgment obtained by the Plaintiff be reduced and apportioned as provided by law; and for such other further and different relief as this Court may deem just and proper.

Dated: New York, New York
October 8, 2020

Yours, etc.

SEGAL McCAMBRIDGE SINGER & MAHONEY, LTD.

By: /s/ Carla Varriale
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